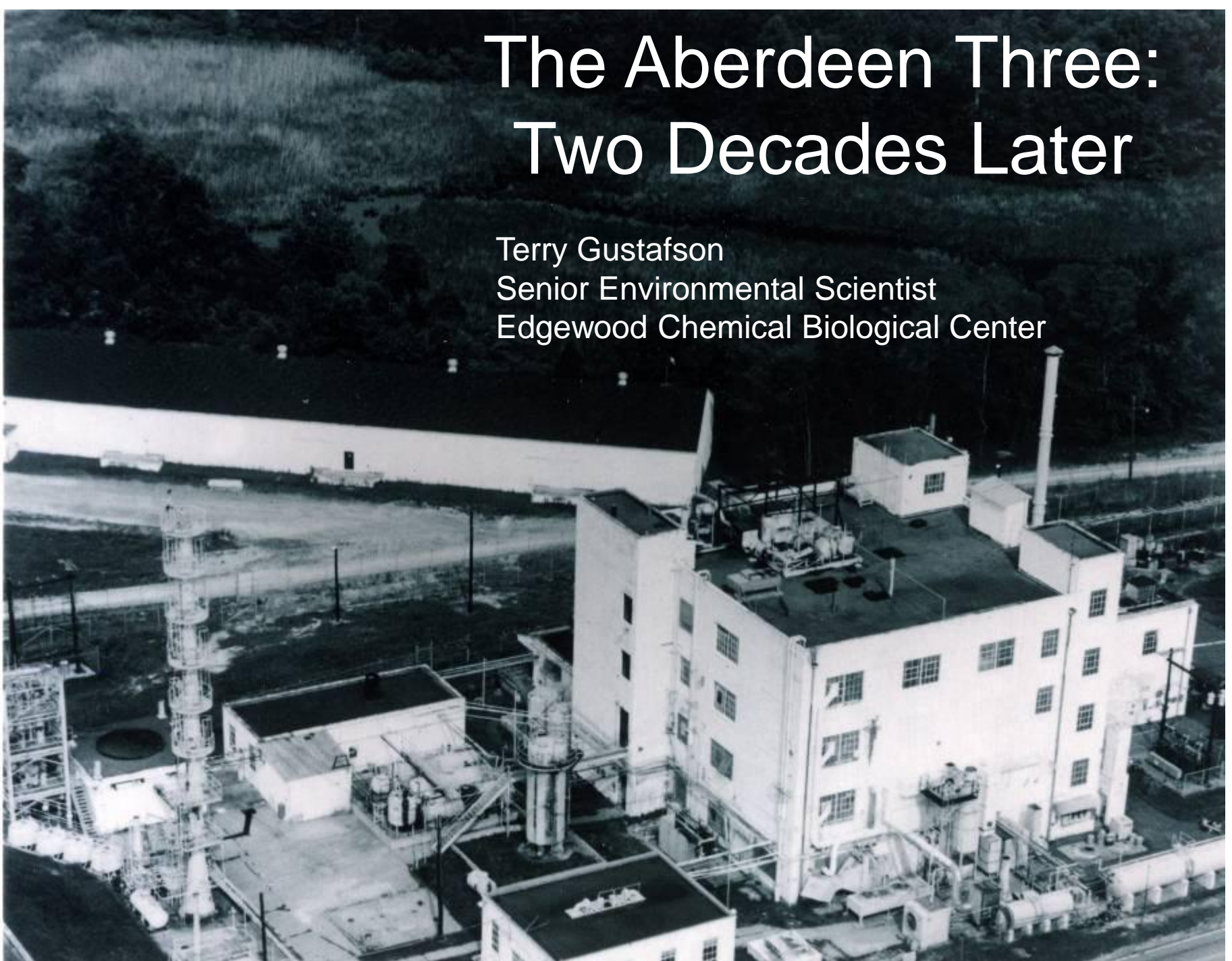


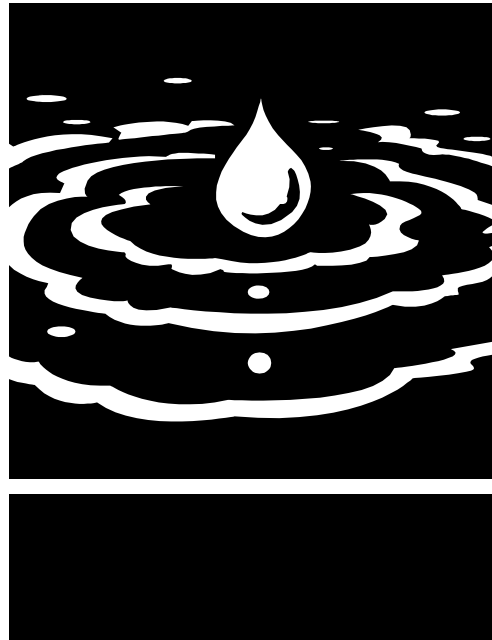
# The Aberdeen Three: Two Decades Later

Terry Gustafson  
Senior Environmental Scientist  
Edgewood Chemical Biological Center



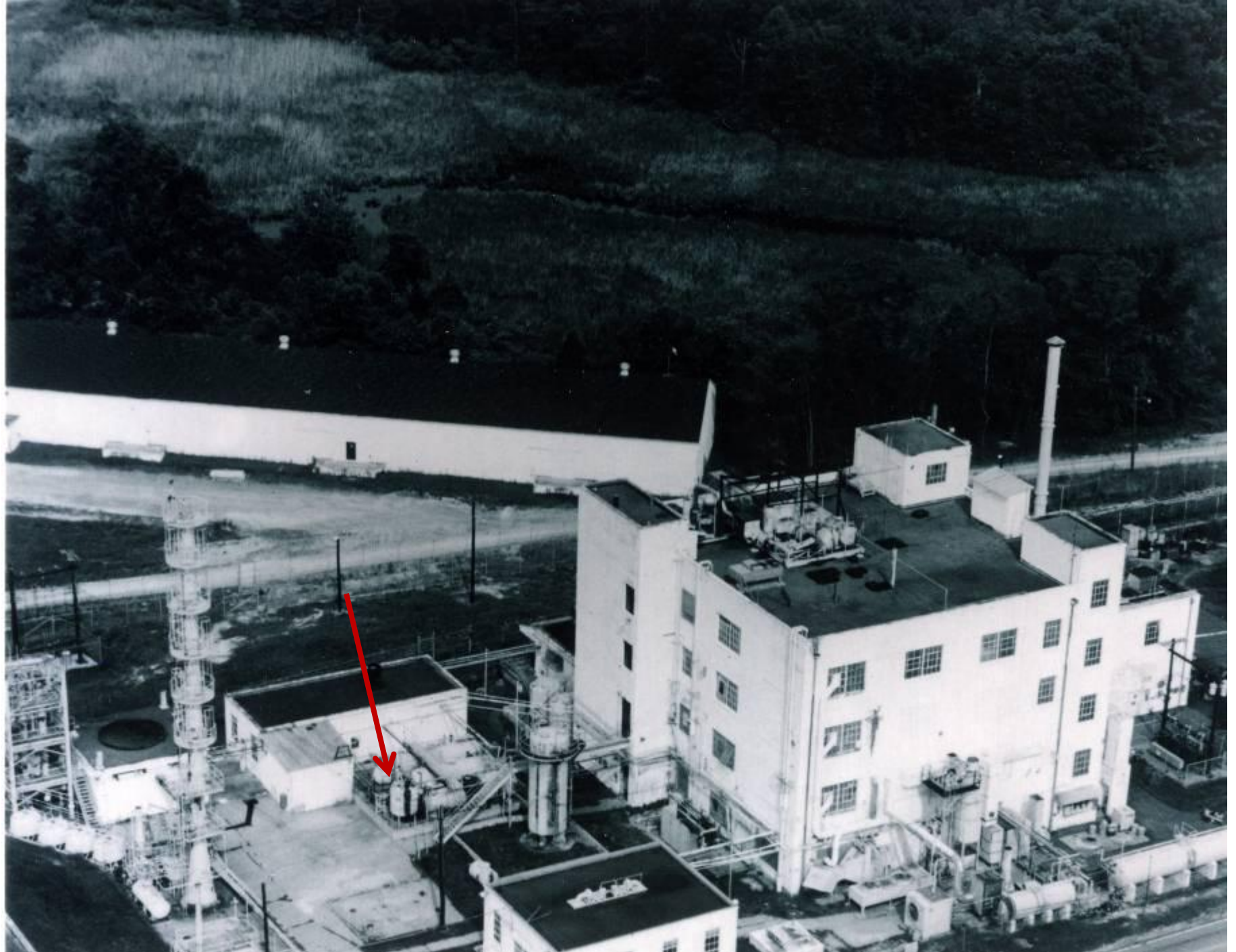
Report Documentation Page			Form Approved OMB No. 0704-0188		
Public reporting burden for the collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Washington Headquarters Services, Directorate for Information Operations and Reports, 1215 Jefferson Davis Highway, Suite 1204, Arlington VA 22202-4302. Respondents should be aware that notwithstanding any other provision of law, no person shall be subject to a penalty for failing to comply with a collection of information if it does not display a currently valid OMB control number.					
1. REPORT DATE <b>MAY 2012</b>		2. REPORT TYPE		3. DATES COVERED <b>00-00-2012 to 00-00-2012</b>	
4. TITLE AND SUBTITLE <b>The Aberdeen Three: Two Decades Later</b>			5a. CONTRACT NUMBER		
			5b. GRANT NUMBER		
			5c. PROGRAM ELEMENT NUMBER		
6. AUTHOR(S)			5d. PROJECT NUMBER		
			5e. TASK NUMBER		
			5f. WORK UNIT NUMBER		
7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES) <b>Edgewood Chemical Biological Center,AMSRD-ECB-PI-BP-CP/Kennedy E3330 ,5183 Blackhawk RD,Aberdeen Proving Ground,MD,21010-5424</b>			8. PERFORMING ORGANIZATION REPORT NUMBER		
9. SPONSORING/MONITORING AGENCY NAME(S) AND ADDRESS(ES)			10. SPONSOR/MONITOR'S ACRONYM(S)		
			11. SPONSOR/MONITOR'S REPORT NUMBER(S)		
12. DISTRIBUTION/AVAILABILITY STATEMENT <b>Approved for public release; distribution unlimited</b>					
13. SUPPLEMENTARY NOTES <b>Presented at the NDIA Environment, Energy Security &amp; Sustainability (E2S2) Symposium &amp; Exhibition held 21-24 May 2012 in New Orleans, LA.</b>					
14. ABSTRACT					
15. SUBJECT TERMS					
16. SECURITY CLASSIFICATION OF:			17. LIMITATION OF ABSTRACT <b>Same as Report (SAR)</b>	18. NUMBER OF PAGES <b>42</b>	19a. NAME OF RESPONSIBLE PERSON
a. REPORT <b>unclassified</b>	b. ABSTRACT <b>unclassified</b>	c. THIS PAGE <b>unclassified</b>			

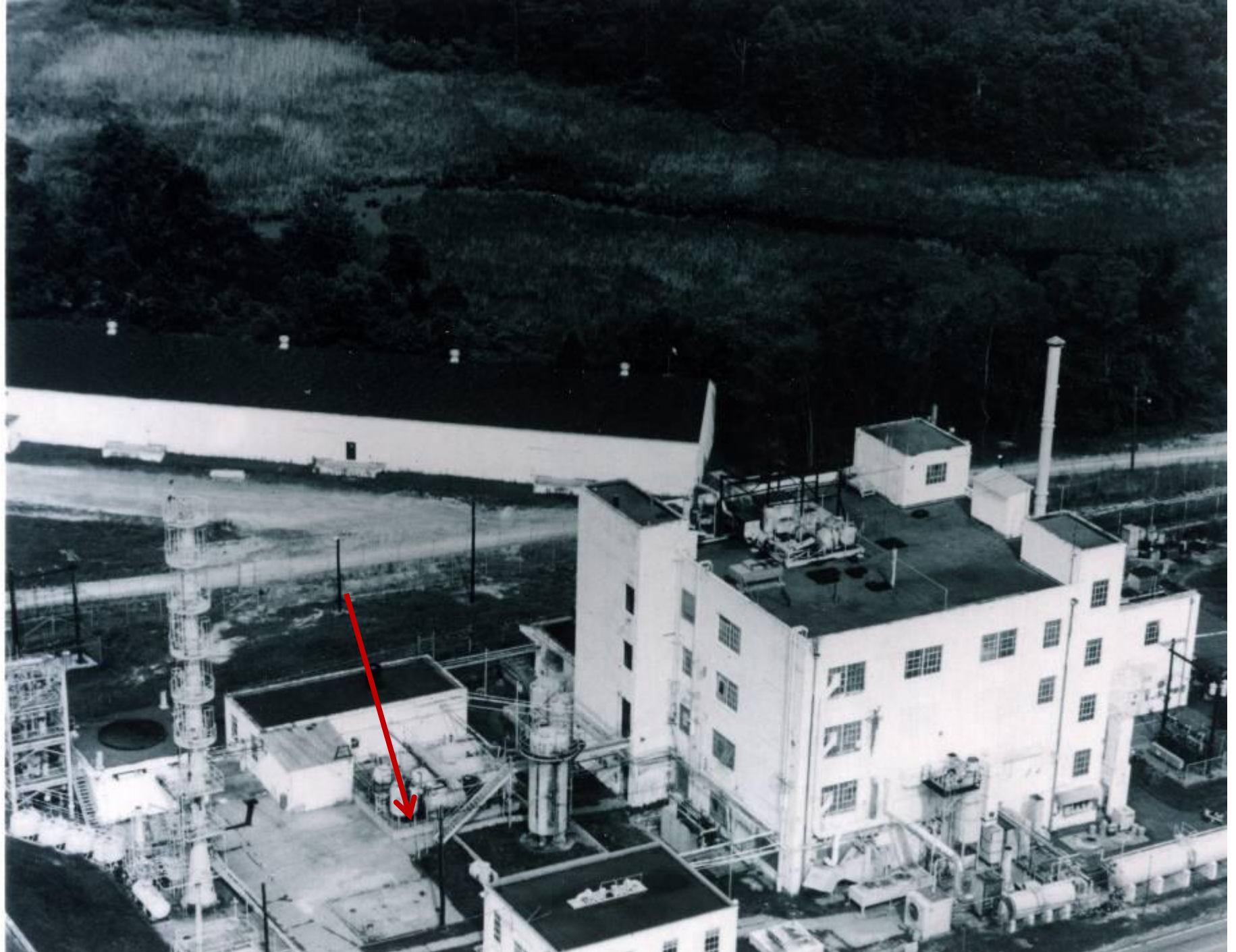
# Sulfuric Acid leak



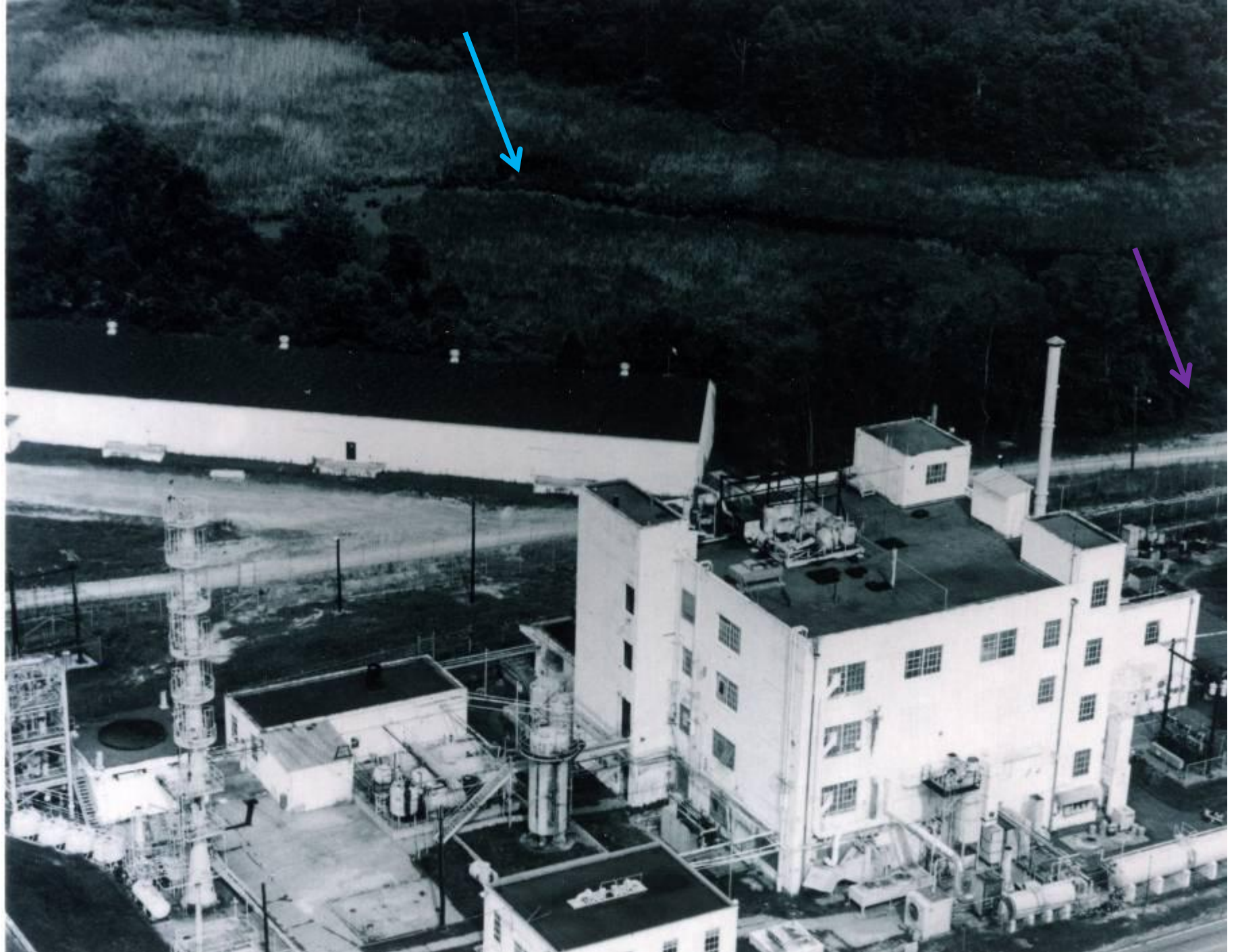
September 17, 1985



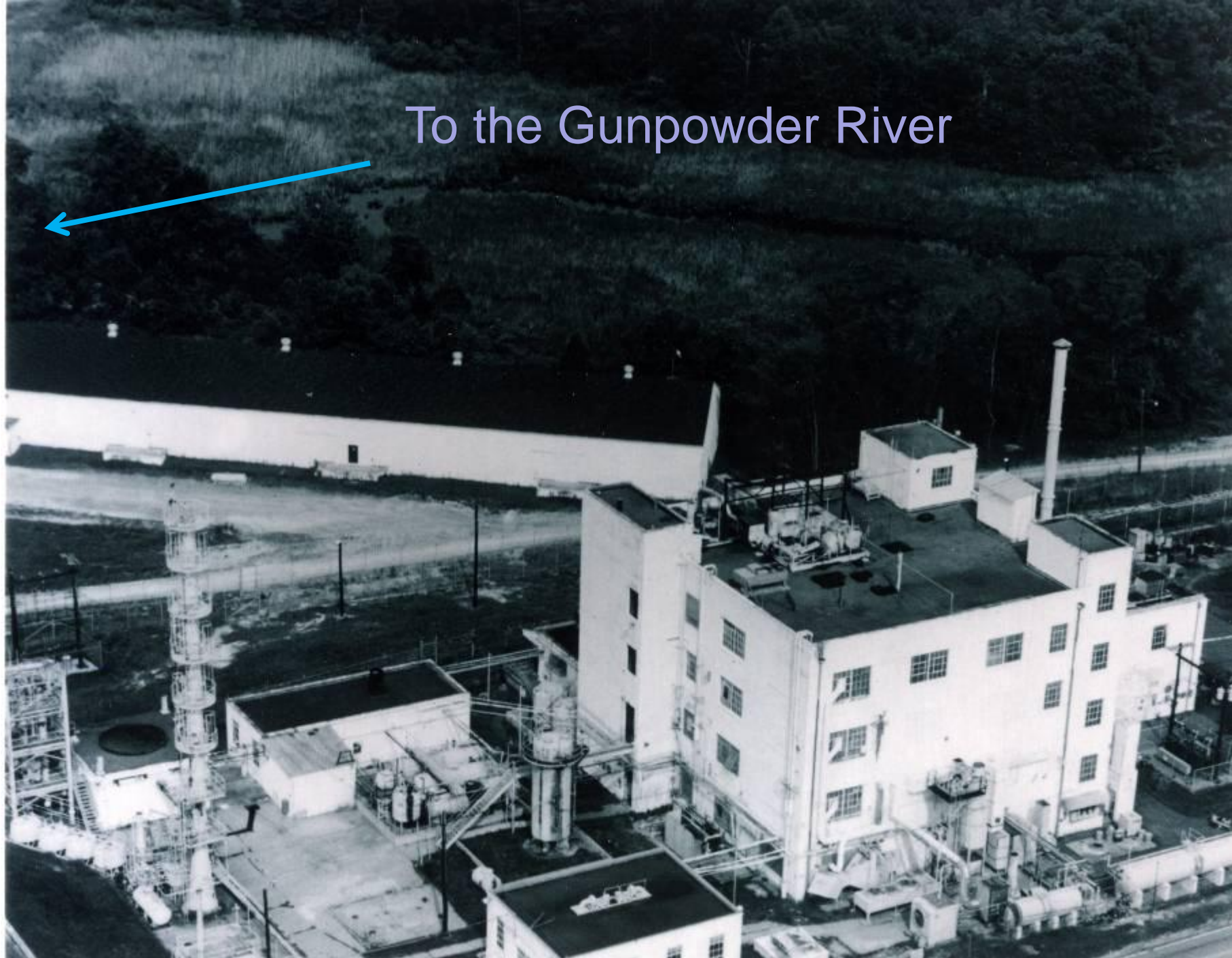






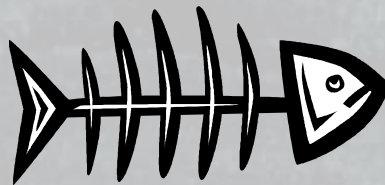
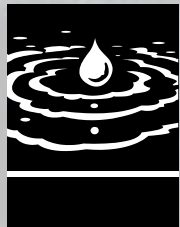


To the Gunpowder River

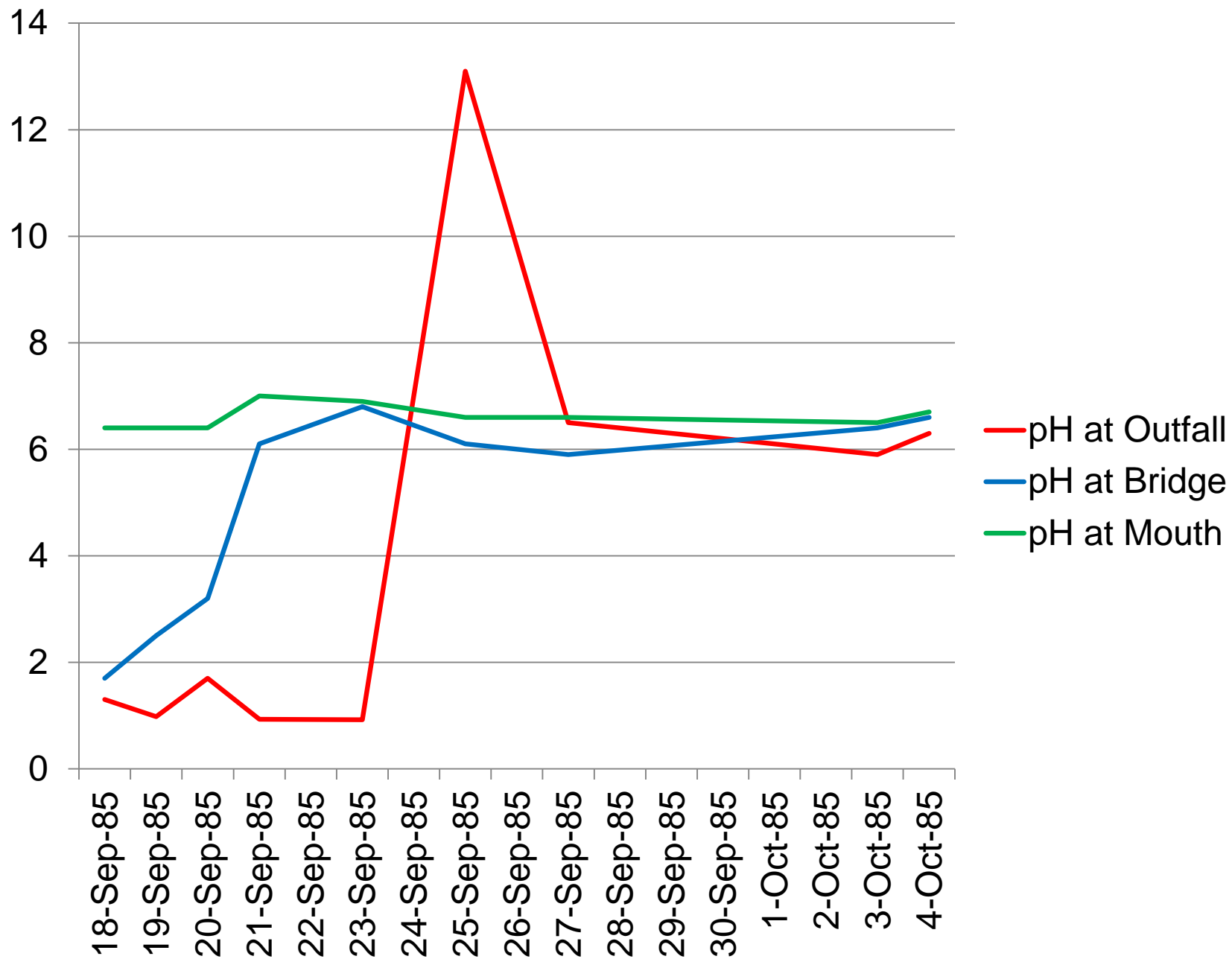




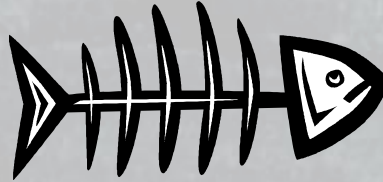
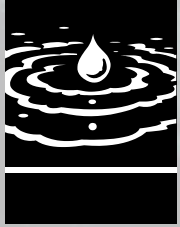
Sulfuric Acid leak → Fish kill





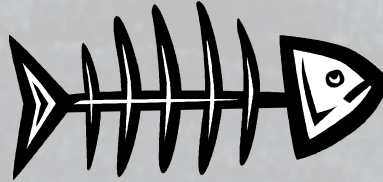


Sulfuric Acid leak → Fish kill → Response by APG  
Clean Up Personnel

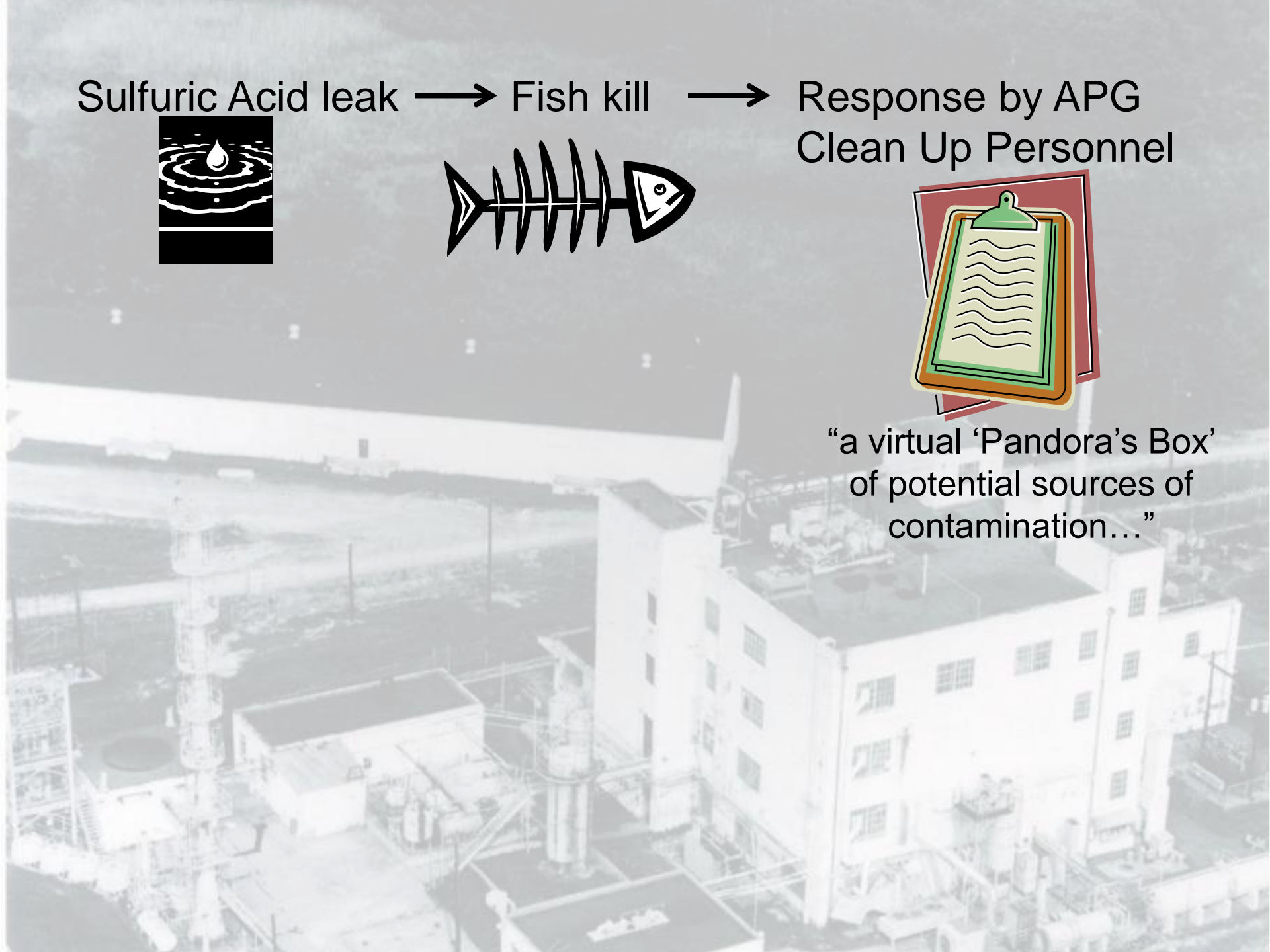




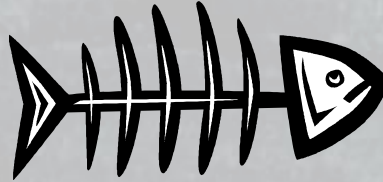
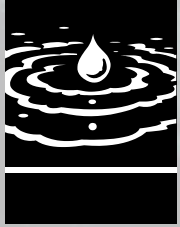
Sulfuric Acid leak → Fish kill → Response by APG  
Clean Up Personnel



“a virtual ‘Pandora’s Box’  
of potential sources of  
contamination...”



Sulfuric Acid leak → Fish kill → Response by APG  
Clean Up Personnel



Baltimore Sun  
coverage



Disgruntled  
employee

“a virtual ‘Pandora’s Box’  
of potential sources of  
contamination...”



# Reports describe long list of dangers at Aberdeen plant

ABERDEEN, from 1A

injured there, and Army studies don't trace any environmental damage to the facility.

The Army halted all chemical work in the building seven weeks ago — after The Sun disclosed an Army waste outflowing possible environmental problems stemming from the physical condition of the facility, known as the pilot plant or Building E3625. The name called the plant, located beside Canal Creek in the growing grove of Edgewood Area, a Pandora's box of potential sources of contamination of surface water and ground water.

Over the past few months, however, an even more alarming picture has emerged of this unique facility where the Army has been researching its new binary chemical weapons in preparation for their production this fall — which will mark the first time in 17 years that this country will be making offensive chemical weapons.

"The plant is a mess," said John Barrett, in charge of enforcing hazardous waste laws for the state health department. "The Army is using a deteriorating World War II structure. Every military base in the country ought to be outraged."

"This plant works with an umbrella of chemicals that have names five and six syllables long — some of the recent stuff in the United States. These chemicals can have all kinds of synergistic effects; you've got to be super careful so you don't harm your workers or let anything get into the waste stream that can harm the community. It's a real question whether they have been anywhere near that careful."

Admiral Daniel M. Barakat, Maryland's chief industrial hygienist from 1975 to 1980 and now head of his own consulting firm in Bel Air, who was hired by The Sun to review technical information about the plant, "Some of the situations at this plant would pose a significant risk of injury — not so much to people living a mile away, because the

lethal nerve agent — a practice directly violating the main safety principle of the Army's new binary weapons."

On another occasion, an Army safety inspector found that about 100 drums of at least 30 different chemicals had accumulated in an area adjacent to the plant unprotected from the weather — an amount appropriate only for a licensed storage facility, which the plant is not. This frightening mix included flammable oils, nerve-agent components, toxic contaminated with mustard gas and an incapacitating biotoxin, pesticides-like substances, and known carcinogens.

When a tank of sulfuric acid at the plant began to leak last fall — a leak that killed some aquatic life in nearby Canal Creek — plant workers didn't report it until the day after the leak was found. This impeded clean-up efforts, Mr. Barrett said.

Three times last year, an Army safety inspector found near the same place in the plant a leaking drum of a corrosive, potentially explosive, toxic liquid that is used to make a nerve agent — a hazardous situation that supposedly had been corrected each time it was found.

Similarly, Army safety inspectors during the last three years cited the plant several dozen times for accumulations of trash, "debris everywhere," unlabeled drums of chemicals sitting around, "bird loaves covering stairs," leaking storm lines, "tremendous amount of junk left in area," and "bulk storage" in its halls and lots of highly flammable chemicals.

Deterioration is so extensive throughout the building that an Army engineer noted in 1985 that its "structural frame has deteriorated beyond economical repair" and that the plant could only be safely used for five years — when it should be scrapped. A new plant is not planned until 1995, the Army says.

By late Friday, Army officials had not responded directly to most of The Sun's findings, of which they were informed Thursday afternoon. Friday, they suddenly called a news



Col. Francis M. Durel is deputy commander of the research center.



two years after it became mandatory — but the application itself cannot be located. The state says it may have misplaced it. Army officials recently requested to register the incinerator. They dated their application Sept. 22, 1980, the state marked it received as of Feb. 11, 1986.

The incinerator may have received an EPA research exemption in the early 1980s, but that would not have allowed the need to comply with state laws, said Donald Andrew, chief of air quality enforcement for the state.

No logs have been kept of what was burned at the incinerator, the Army told the state. Lately it has been used to burn methyl chloride gas, which investigators believe is a safe process.

But the Army has told the state it burned "solid biological waste" there in 1979.

And, sources say, more than 1,000 pounds of cyanogen chloride, a lethal agent that disrupts the blood's oxygen-carrying ability, was carried to the plant and burned in 1981. In that case, Mr. Andrew said, the device would be a hazardous waste incinerator and need an additional permit.

## Building E3640

In spring 1983, sources say, plant workers were sent to Building E3640, a closed Edgewood lab, to bring back several truckloads of boxes containing hundreds of containers of different powders and liquids in amounts up to several gallons.

Only about half the containers were labeled and many of those couldn't be read, the sources say. Over several weeks, the workers were ordered to dump the containers into the plant's storage — while a chemical made only a cursory effort to identify them, sources say. Dump wastes are only treated for acid-base status before being sent into the base's sanitary sewers.

Mr. Allingham has said the CRDEC knows of no such dramatic

outrage. A NIOSH chemical registry and another computer list of 1.5 and 100 compounds do not include this chemical name.

## Unprotected workers

In spring 1983, unprotected workers were ordered to crack open with a small about 300 steel canisters, each containing several gallons of a mixture of two chemicals used to simulate the components of a biotoxin weapon, sources say. The workers were given no safety warnings about the liquids, sources say at one point, some of the liquids splashed into a worker's eye.

NIOSH identified the two chemical canisters used in the making of pesticides and said that one of them, tri-n-butyl phosphite, is not moderately to highly toxic.

Dr. Barakat, Richard Rook, a NIOSH safety research engineer, and Grace Ziem, a local occupational health physician, believe that TB could disrupt human nervous systems in ways similar to nerve agents and recommended that those handling it wear a full protective suit and self-contained breathing apparatus. Asked about this incident Thursday, the Army did not respond.

## Bad mixes

On July 27, 1983, a CRDEC safety inspector found that plant workers had stored together in a first-floor lab a chemical called DF and another known as pinacolyl alcohol. The inspector noted that the two compounds were "incompatible" and that they should not be in the same building.

DF is one of two components of the binary shell that has much in common with pinacolyl alcohol. Dr. Barakat said, if the two were mixed, he said, the result would be a lethal nerve agent similar to the one used in the binary shell.

This violation of the new safety

## APG boss denies he OK'd dumping

By Kelly Gilbert

Ensigns said

The manager of the Pilot Plant Aberdeen Proving Ground has denied to a federal jury that he knew or approved of employees dumping solvent and other hazardous wastes into sample there in violation of federal environmental regulations.

Carl E. Gepp answered a flat, "No, I did not" when prosecutor Veronica M. Clarke asked him yesterday if he approved of the dumping.

But Gepp admitted during cross-examination that he knew chemicals were poured into the sample after they were salvaged from an abandoned research building, that there were no records of precisely what chemicals were dumped and that one of the sample was not equipped with monitoring equipment to show what was in it.

Gepp is the second of the three defendants to testify at his trial in U.S. District Court with William C. Doe and Robert E. Lantz, his boss in the Army's chemical warfare research program. The three civilian managers are charged with violating federal water pollution and hazardous waste laws.

The sampling is central to both sides for the criminal indictment in the case charges that the sample were part of a neutralization system at the plant which was not capable of treating solvents or certain other hazardous wastes.

Gepp testified that he believed the sample were routed through the neutralization tank, which was connected to the base sewage treatment system.

Prosecutors Clarke and Jason P. Barrett, however, already have presented evidence that one of the sample were chemicals were dumped bypassed the neutralization system and led directly to the sewage treatment plant, much also was not equipped to properly treat the solvents and other chemicals.

On direct examination by defense attorney William A. Hahn Jr., Gepp testified yesterday that over several years he submitted a series of work orders to Aberdeen officials for repairs to leaky pipes, broken floor tiles and brickwork, a collapsed roof that fell on canisters of nerve gas chemicals, a dirt ground outside chemical storage tanks and numerous other items at the 47-year-old Pilot Plant.

The defendant said Army officials marked several of the work orders "completed" but performed only a few of the repairs.

Throughout his testimony, Gepp sought to show that he was a skilled plant manager, sensitive to environmental concerns, who was hampered by an unresponsive Army bureaucracy.

He detailed, for example, a litany of phone calls he made after an acid spill at the plant in 1985 that started by reported the spill as soon as he learned of it and assisted in the cleanup effort.

At one point, Gepp spent nearly an hour explaining the uses of Pilot Plant chemicals that the prosecution claims were hazardous wastes illegally stored, treated and disposed of by plant workers.

"I did not consider any of them waste," Gepp said. "I considered them to be chemicals that had a use in the plant's laboratories," he said.

Gepp also criticized the removal of 1,000 to 2,000 containers of chemicals from the Pilot Plant by a "Technical Support" team when the plant was ordered closed by Army officials in 1988.

# Maryland



Brig. Gen. James R. Klugh (left) and Maj. Gen. William Potts, of Aberdeen Proving Ground, attend military services appreciation ceremony during Harford County Council meeting.

## Harford officials say Army misled them

By Robert Benjamin

Three Harford County politicians, responding to recent disclosures about hazards at the Army's chemical weapons research plant at Aberdeen Proving Ground, accused Army commanders yesterday of misleading them for weeks about the problems at the facility.

In separate interviews, the three county elected officials all said they had sought information about the plant from the Army in recent weeks and, in turn, had been repeatedly assured by Army commanders that the plant posed few problems.

Then, an article in *The Sun* Sunday detailed a wide range of environmental-protection and worker-safety problems at the key research facility — problems that Army officials largely knew about for at least several years, according to their own doc-

uments. And, the politicians said, they began to feel that the Army had walked them out on a limb and left them there.

"We were told that there were no real problems of the plant," said Barbara A. Riewer, a Harford County councilwoman. "I'm not at all impressed with the way the Army has handled this. I don't think they've been up-front with us."

"We've been quite concerned about the plant, and all we got from the Army was 'no, no, nothing's wrong there,'" said state Sen. Catherine I. Riley. "We tried to work with them, we bought what they said and we defended them. Now I don't know what to do."

State Delegate Barbara G. Kraemer, D-Harford, added, "The Army has been very hard to get answers from. This is exactly the kind of thing that I've been worried about

happening at Aberdeen. I do think there may have been some intentional misleading going on here."

Also responding yesterday to the disclosures in *The Sun*, U.S. Representative Helen Delich Bentley, R-2nd, said she will be meeting tomorrow at the proving ground with a representative of the secretary of the Army and with Brig. Gen. James R. Klugh, commander of the Army's Chemical Research, Development and Engineering Center, which runs the plant. Mrs. Bentley said she wants to know "the whole story."

General Klugh, who has not responded to *The Sun's* disclosures, had been scheduled since last week to appear at last night's Harford County Council meeting to discuss the plant.

Thought the general attended a

See ABERDEEN, 4E, Col. 1

VOL. 86 NO. 13

## Reports find Aberdeen plant rife with danger

By Robert Benjamin  
Sun Staff Correspondent

U.S. Army officials, one day after being confronted with the findings of *The Sun's* three-month investigation of their chemical weapons research plant at Aberdeen Proving Ground, announced Friday that they would not reopen the facility except possibly in special cases. Here is what *The Sun* found:

**ABERDEEN PROVING GROUND** — The U.S. Army here has been conducting key research for its next generation of chemical weapons in a trash-strewn, deteriorating facility where a witches' brew of uncommon, highly hazardous substances was often mishandled, an investigation by *The Sun* has found.

The Army interned chemicals at the research plant without required state registration and inspections. Undeclared chemicals were dumped into the building's drains, which feed into the proving ground's sewers. On at least one occasion, unprotected workers were exposed to a toxic substance there. Hazardous chemicals were improperly stored at the plant — at times, in combinations that could have produced lethal nerve agents.

In many cases, the chemical handling practices at the facility over the last few years apparently breached state and federal environmental protection and worker safety laws. But even state inspectors, who have been investigating the facility for six weeks, have not yet been able to resolve some of these issues.

Army officials, apparently responding to *The Sun's* investigation of the 45-year-old research plant, hastily called a news conference Friday in which they acknowledged for the first time that they had been aware of some of the plant's problems for at least five years and announced they would close the facility — except possibly for emergencies. Army officials say no one has been



SUN GRAPHICS

See ABERDEEN, 14A, Col. 1



ound Orioles, 12-0: 1B

IN GAME SEVEN, 117-114, TO REACH NBA FINALS: 1B



SUN

BALTIMORE, MARYLAND

SIZZLING  
RAIN POSSIBLE  
SEE PAGE 12F

\$1.25



As he does every year, the Rev. Sumner E. Parson remembered his fallen comrades from the First World War at a Memorial Day service yesterday at National Cemetery. AT

## Probe reported on Aberdeen's toxin disposal

Federal inquiry centers on 'pilot plant' procedures

By William F. Zorzi Jr.  
Harford County Bureau of The Sun

**ABERDEEN PROVING GROUND** — A federal grand jury is investigating Army and civilian officials who oversaw the operation of a deteriorated 46-year-old test facility where highly hazardous substances frequently were mishandled, according to informed sources.

The investigation centers on alleged violations of federal environmental and worker-safety laws involving handling, storage and disposal of dangerous substances, including components of lethal nerve agents, at the facility, known as Building E5625 or the "pilot plant," sources said.

Some of the alleged violations were first revealed in a series of articles that appeared in The Sun in early 1988, they said.

FBI agents and federal prosecutors are poring over scores of Army documents subpoenaed by the grand

jury May 6 and delivered May 19, amid allegations that some records had been falsified and supervisors had lied in an attempt to cover up some questionable practices at the plant, sources said.

The investigation also has uncovered evidence that the Army appeared to have used the plant not just for storing hazardous waste from this Harford County installation, but also from other bases around the country, sources said.

"It was even worse than we first thought," said one person familiar with the investigation. "It's scary stuff."

John G. Yacubian, a spokesman for Maj. Gen. Charles F. Drenn, the base commander, referred an inquiry about the probe to Breckinridge L. Wilcox, the U.S. Attorney for the District of Maryland.

Mr. Wilcox would neither confirm nor deny the existence of an investigation.

But, according to several sources, the grand jury has subpoenaed records spanning from January 1962 to the present from the Army's Chemical Research, Development and Engineering Center (CRDEC).

See **ABERDEEN**, 1-4A; Col. 1

## U.S. reorganizes forces in its drive to halt drugs

From Wire Reports

the president's announcement yesterday. Mr. Bush issued a statement

# Army admits plant faults at Aberdeen

Chemical weapons research will be moved from facility

By Robert Benjamin  
Sun Staff Correspondent

**ABERDEEN PROVING GROUND** — The U.S. Army, apparently responding to The Sun's investigation of its aging chemical weapons research plant here, acknowledged problems at the plant for the first time yesterday and announced that it will not reopen the facility — closed seven weeks ago — except possibly in special cases.

Research projects at the plant will be shifted to other Edgewood facilities or to commercial contractors off the base, Col. Francis M. Durel, Deputy Commander of the Army's Chemical Research, Development and Engineering Center (CRDEC), said at a hastily called press conference.

The colonel added that the Army might still use the building for research on a single, unspecified antiterrorist project, or in the case of an emergency situation.

The 45-year-old building, known as the pilot plant and located in the proving ground's Edgewood Area, has been a key research site for the Army's new binary chemical weapons — weapons that are to go into production elsewhere this fall, marking the first time in 17 years that the United States will be making offensive chemical munitions.



**COL. FRANCIS M. DUREL**  
Acknowledges problems

dumped into the plant's sumps, which feed into the proving ground's sewers.

At least on one occasion, unprotected workers handled toxic substances without being told of the potential danger.

Hazardous chemicals were often improperly stored — at times, in combinations that could have produced lethal nerve agents.

# THE ABERDEEN MESS

THE PILOT PLANT AT THE ABERDEEN PROVING Ground, the Army's weapons testing and development facility in northeastern Maryland, had been Carl Gepp's domain since 1975. He loved it like a boy loves his basement workshop—as a place to tinker and to dream. Like Gepp himself, his crew of engineers and technicians preferred overalls to suits, pipe wrenches to computers. Long ago, they had chosen the Army's chemical weapons program over the glossier world of private industry, and they were wedded to their reactors and distillation columns like prize farmers to the land. When a filter needed to be changed or a pipe welded, they did it themselves. No need for outsiders. Amid the concrete floors and exposed beams of the Pilot Plant, they found a refuge from the "paper pushers" elsewhere at Aberdeen.

On the chilly afternoon of March 26, 1986, Gepp called his crew together. Twenty workers filed into the Pilot Plant's little conference room as "the boss" stood just inside the doorway in front of them. He had an announcement.

"We're closed down," Gepp said. "We're all moving on."

The crew grumbled.

Of all the times to close the plant, why did it have to happen now? A 17-year ban on chemical weapons production had been lifted, and the crew felt like things were moving again. But the Pilot Plant had become the center of an environmental controversy, sparked by a memo from an Aberdeen environmental inspector calling it "a Pandora's box of potential sources of contamination." Gepp told his men the Army brass had decided to temporarily shut down operations.

At first, Gepp put up a strong front. He said he hoped they'd reopen and, anyway, someday they'd work together again. Then, as he recounted their years at the plant, the word "pride" tripped his composure. His voice cracked, and his eyes welled with tears.

It was the first time Gepp had cried since his father died of cancer. The closing felt like losing a family—his work family. He didn't know what would happen to his crew. After 21 years at Aberdeen and at age 49, he didn't know exactly what was going to happen to him, either. Standing there, Gepp thought it had to be the hardest day of his life. He was wrong. The hard times were only beginning.

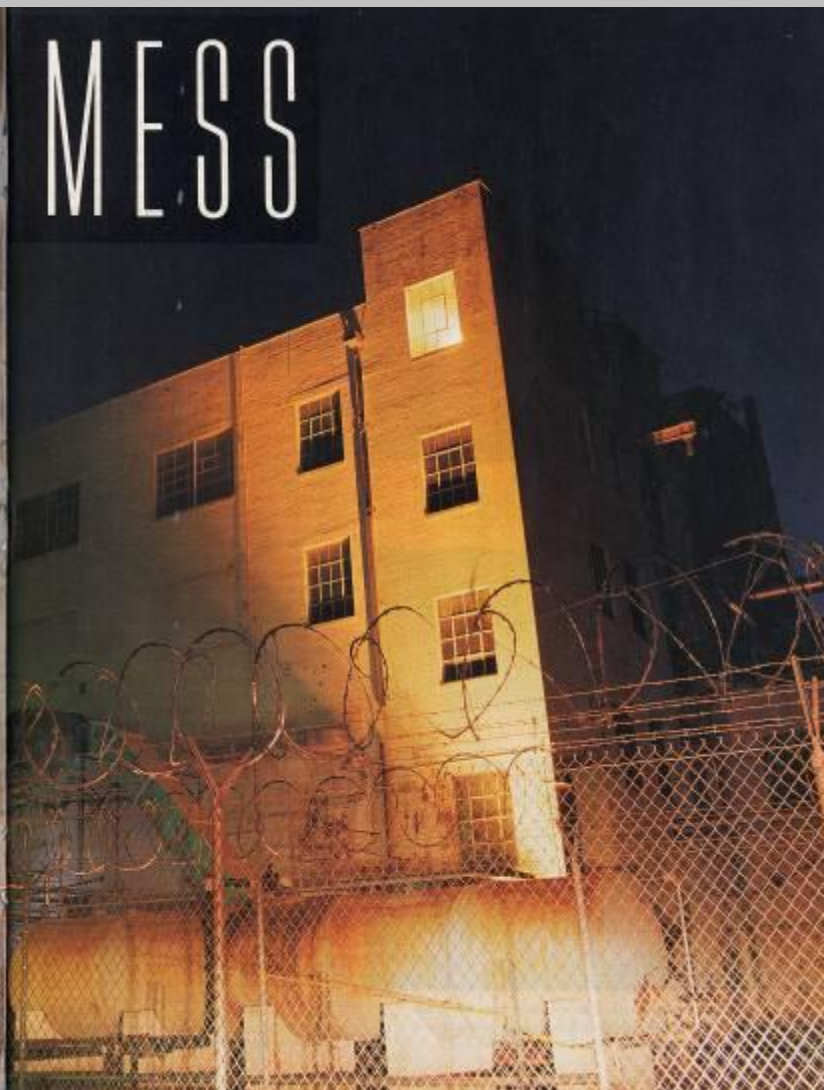
LAST WEEK, CARL GEPP AND TWO OF HIS SUPERIORS WERE CALLED TO TRIAL in a Baltimore federal court—accused of violating federal environmental laws at his beloved Pilot Plant. Gepp's two bosses, William Dee, 56, and Robert Lentz, 50, worked in offices miles from the plant, but like Gepp, they have spent more than two decades in the Army's chemical weapons program. All

At the Army's  
chemical weapons lab,  
environmental laws  
took a beating.  
Now who takes the rap?

By MICHAEL WEISSKOPF

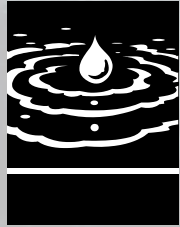
Photographs by STEVEN PUMPHREY

THE PILOT PLANT AT THE  
ABERDEEN PROVING GROUND

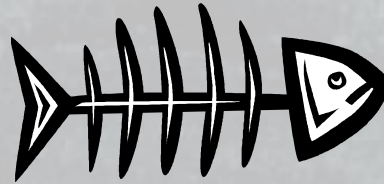




Sulfuric Acid leak

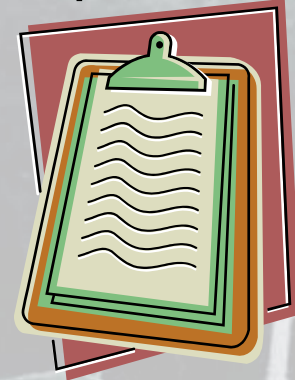


→ Fish kill



→

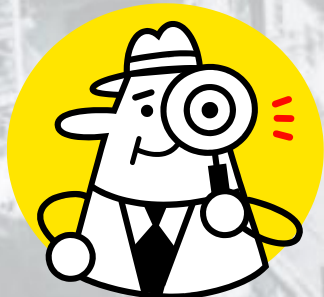
Response by APG  
Clean Up Personnel



Baltimore Sun  
coverage



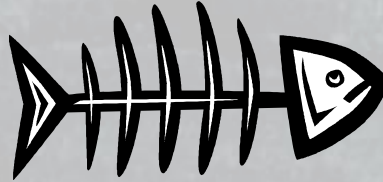
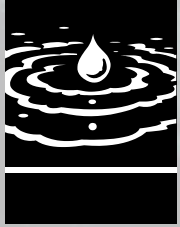
FBI  
Investigation



Disgruntled  
employee

“a virtual ‘Pandora’s Box’  
of potential sources of  
contamination...”

Sulfuric Acid leak → Fish kill → Response by APG  
Clean Up Personnel



Baltimore Sun  
coverage



Disgruntled  
employee

“a virtual ‘Pandora’s Box’  
of potential sources of  
contamination...”

FBI  
Investigation → Indictment → Trial



# Trial begins for three APG managers

By Kelly Gilbert  
Livingston Sun Staff

Three Aberdeen Proving Ground chemical warfare research managers, on trial on criminal environmental charges, showed their hazardous waste disposal responsibilities so badly that an environmental prosecutor has told a federal jury.

But defense attorneys contended that the Army's base commander and state and federal environmental officials, not the civilian defendants, were responsible for management and disposal of the hazardous chemical wastes allegedly generated in the Edgewood area of the proving ground.

The three managers, William C. Dee, 58, Robert E. Lentz, 56, and Carl E. Gepp, 58, formally went on trial in U.S. District Court here late yesterday on hazardous waste counts. They are charged with four violations of the federal Resource Conservation Recovery Act and with one count of violating the Clean Water Act related to their chemical warfare activities from June 1983 to April 1986.

The alleged violations occurred mostly at a now-closed, four-story research facility known as the "Old Pilot Plant" and at a shed on the Pilot Plant compound.

All five charges stem from the alleged lack of federal permits for the treatment, storage and disposal of hazardous wastes and for chemical discharges into Chesapeake Bay.

"The case can be summed up in one word: responsibility," said prosecutor Jane F. Barrett in her opening statement to the jury as the trial began.

"These men were hired by the Army as managers of a very sensitive and technical area of our defense system. They were responsible for their employees properly handling hazardous waste and complying with federal environmental laws. But they shirked their duties, ignored their responsibilities, and let illegal acts occur."

Barrett described the Pilot Plant, at Aberdeen, and the "Old Pilot Plant" in the Edgewood area of the proving ground as "Pandora's box" of environmental problems, caused by chemical research the defendants operated in secret behind double-barbed-wire fences and armed guards.

Those problems included leaking, crumbling drums meant to contain spills, routine dumping of chemicals into sewers that led to the Chesapeake Bay, broken storage bottles, and barrels, acetone, unlabeled chemicals and a massive fish kill in Coral Creek in 1986, she said.

Gepp, the pilot plant's manager, failed for more than four hours to report the sulfuric acid spill that caused the fish kill, Barrett said.

In addition, leaking drums of chemicals were found in a shed on the Pilot Plant compound. Sovereign environmental authorities decided to blow up the drums because they contained unidentified chemicals, federal prosecutors maintain.

Subsequent investigations — one apparently triggered by a disgruntled Pilot Plant employee who Barrett said became "a whistle-blower" — led environmental authorities to the discovery of substantial hazardous waste problems at the plant and led a grand jury to the indictment of the three defendants on criminal charges last summer.

Barrett did not name the whistle-blower.

Richard M. Karowski, Dee's defense lawyer, countered that the de-

fendants were "kennels" of the Army who were not responsible for the "poor housekeeping" in the decrepit 50-year-old building, where 1987 workers who lacked the ability to repair or replace it.

He charged that the base commander, an Army general, and state and federal environmental officials were legally responsible for monitoring and arranging proper disposal of the plant's chemical wastes and for enforcing the hazardous waste laws that the defendants are charged of violating.

"Responsibility is a two-way street," Karowski told the jury. "There was nobody around to tell anyone what to do, to train these men to inspect the buildings."

Karowski said the Resource Conservation Recovery Act is complex and "it can't be easily followed," adding that "Nothing these men (defendants) did was to keep things bad for the law."

William A. Kahn Jr., Gepp's attorney, said, "Money . . . the lack of funding and the extreme organizational mess these men inherited would play a very important role" in their defense. He did not elaborate.

George A. Brevetti, Lentz's attorney, said he would "review his opening remarks until the end of the prosecution's case."

# Former Aberdeen general denies knowing of problems until news reports

By Karen E. Warmkesel

The former commander of the U.S. Army's chemical weapons research program at Aberdeen Proving

Ground testified yesterday that he was not aware of possible environmental violations at an aging research plant until news reports prompted him to order an investigation.

Maj. Gen. James R. Klugh, who served as commander of the Chemical Weapons Research and Development Center from 1984 to 1986, told

a federal jury that the plant's civilian managers assured him that hazardous chemicals were not being dumped illegally and that no laws had been broken.

The plant's civilian managers, Carl E. Gepp, and his immediate superiors, Robert E. Lentz and William C. Dee, are charged with four felony violations for illegally storing and disposing of hazardous waste and with a misdemeanor water pollution charge stemming from a sulfuric acid spill at the plant in September 1985.

General Klugh, a 35-year Army veteran who is now assistant deputy chief of staff for the Washington district at the Pentagon, said yesterday that he asked the Army's inspector general to investigate after a reporter raised questions about the handling of hazardous chemicals.

In early 1986, The Sun published a series of articles detailing the mishandling of chemicals. The first article was prompted by a memo by an Army engineer who called the plant a "Pandora's box" of environmental problems.

Although the inspector general found no criminal wrongdoing, General Klugh testified he decided to close the plant in March 1986 after another study found sewer pipes leading from the plant were leaking.

"I was concerned with any leaks in the underground pipes because that would not let us control contaminating the soils or anything," he testified. The general said he also felt that experiments being conducted at the 47-year-old plant could be done elsewhere.

General Klugh testified yesterday that he never saw the "Pandora's box" memo until after a reporter's inquiries. He said Mr. Dee told him nobody was dumping chemicals down the drains illegally.

Asked by Jane F. Barrett, an assistant U.S. attorney, if he was satisfied that crimes had not been committed, the general replied, "I believed what my supervisors were telling me."

He said both Mr. Dee and Mr. Gepp assured him that chemicals were being disposed of in accordance with the law and Army regulations. The general said the supervisors were responsible for ensuring that employees complied with the regulations.

During the monthlong trial, former employees of the plant have testified that they dumped chemicals into the sumps at the plant and over the ground outside. The sumps and underground holding pits, lead into the plant's sewer lines, which other witnesses testified leaked.

Defense lawyers have contended that the three managers did not knowingly violate federal environmental law or Army regulations.

Prosecutors are expected to conclude their case today.

Accused of shirking waste responsibilities



# Defense Calls Aberdeen Proving Ground Environmental Trial a 'Witch Hunt'

By Paul W. Valentine  
Washington Post Staff Writer

BALTIMORE, Jan. 10—Federal prosecutors opened their case today against three top civilian managers at the Army's Aberdeen Proving Ground, claiming they allowed illegal storage and dumping of poisonous chemical warfare materials there. The defense responded with accusations of a government "witch hunt."

Prosecutor Jane F. Barrett said the three "turned their backs on responsibility" and violated environmental laws.

It is a bitter retort to the jury in U.S. District Court here, defense attorney William A. Hahn called the case a "witch hunt" in which the defendants were "singled out" unfairly.

And another lawyer, Richard Karwinski, accused what may comprise much of the

defense, saying the three civilians were "tenants" at the weapons testing center with little power beyond reporting environmental standards to higher authorities.

"If there is responsibility, it is that of the [military] commander of Aberdeen Proving Ground," said Karwinski.

The trial, being watched closely by both environmentalists and Washington officials, is viewed as a test of whether civilian managers can be held criminally liable for violations of environmental law on a military reservation.

The trial, presided over by U.S. District Judge John R. Hargrave, is expected to last five to six weeks.

The alleged chemical dumping from 1963 to 1968 focused off protests by residents near the 78,000-acre testing ground 25 miles southeast of Baltimore and sparked investigations by state and federal authorities.

*"If there is responsibility, it is that of the [military] commander of Aberdeen Proving Ground."*

—Defense attorney Richard Karwinski

U.S. Attorney David L. Wilson, Maryland's chief federal prosecutor, said the case reflects "the absolute disregard of the U.S. Army of federal and state laws governing hazardous waste."

Investigators said they do not know whether any employees or residents have been harmed but said the alleged dumping

caused one major fish kill on a Chesapeake Bay tributary.

The accused civilians are William Dee, 48, former head of the munitions directorate of the Chemical Research Development and Engineering Center; Robert Lentz, 50, a former division chief in the directorate; and Carl Gepp, 51, manager of a facility called the Pilot Plant, where part of the alleged storing and dumping occurred. All three have been assigned to other jobs at Aberdeen.

The five-count indictment charges the three with letting various dangerous chemicals be dumped into dumps leading to a sanitary sewer, storing unlabeled and broken chemical containers in a shed after being warned of safety hazards and discharging sulfuric acid into a creek, killing hundreds of fish in September 1968. Each defendant faces up to 21 years in prison and more than \$1 million in fines if convicted.

In her opening statement, Barrett described the Pilot Plant as "unwieldy . . . and in disrepair." She said it lacked a permit for storing hazardous chemicals and the defendants ignored repeated warnings by inspectors that the facility was not in compliance with environmental rules.

Karwinski said that because of their "tenant" relationship with Aberdeen, the defendants could do little. He did not explain "tenant" relationships.

He said others at Aberdeen were responsible for the maintenance of the facilities and the money to pay for it. Karwinski and Hahn indicated that the defendants were aware of environmental problems but were

prevented from taking action by bureaucratic roadblocks and lack of money. "There was no money," said Hahn. "Things that had to be done were not done."

# 3 civilian managers at Aberdeen 'turned their back' on responsibility, jury told

By Karen E. Warrinnesel

Federal prosecutors told a jury yesterday that three top civilian managers at Aberdeen Proving Ground violated federal law by mis-handling hazardous chemicals at an aging chemical weapons research plant once described as a "Pandora's box" of environmental problems.

"The central issue of this case can be summed up in a single word. That word is responsibility," said Jane F. Barrett, an assistant U.S. attorney, during opening statements at their trial in federal court.

She said the men permitted the dangerous mismanagement of the chemicals when they "turned their back on their responsibility" and "ignored" a system set up by the U.S. Army to properly treat, store and dispose of hazardous wastes. The alleged violations occurred at the so-called "yolot plant" in the proving ground's Edgewood area.

Ms. Barrett said the government

will not produce any evidence that the defendants "stood over a dump or a pit and poured in a hazardous waste. Those actions were done by their subordinates."

But defense lawyers said the real responsibility for operation of the 47-year-old plant lay with the base commander, not the managers who were forced to deal as best they could with deplorable conditions there.

"What we have here is a witch hunt," said William A. Hahn Jr., who represents Carl E. Gepp, the former manager of the research plant. "We feel very strongly that we have been singled out."

Mr. Hahn said that because of a lack of money and organizational problems at the base, "The things that had to be done weren't done."

"Do not find them guilty of the actions of other persons," said Richard M. Karwinski, a lawyer representing William C. Dee, who had been one of Mr. Gepp's superiors.

Mr. Karwinski said the three managers did not knowingly violate the law and were guided by "very nebulous" Army regulations that allowed for considerable discretion on their part.

Mr. Gepp, Mr. Dee and a third defendant, Richard E. Lentz, are charged with four felony violations of the federal Resource Conservation and Recovery Act, and with a misdemeanor water-pollution charge for a sulfuric acid spill at the plant in 1965.

All three men were employed by the Army's Chemical Research, Development and Engineering Center, the main chemical weapons group that operated the plant, Mr. Dee

served as director of its munitions directorate, and Mr. Lentz was chief of the productivity, engineering and technology division of the munitions directorate under Mr. Dee.

Since their indictment, the defendants have been working for another Army agency. If convicted, they could be fined as much as \$1.1 million each and could spend up to 21 years in jail.

The trial, which is expected to last five to six weeks, will address the question of whether federal workers can be held criminally liable for violations of federal environmental laws.

The indictments followed an 18-month federal investigation stem-

ming from articles in The Sun in the spring of 1969.

During her opening statement, Ms. Barrett detailed the deplorable conditions at the plant, where investigators discovered hundreds of cracked and leaking drums containing hazardous chemicals. The plant did not have the permit to store, treat or dispose of hazardous waste required by federal law, she said.

Ms. Barrett told the jury that it took the defendants a year to order the removal of broken containers of dimethyl polysulfide, a chemical known as DM that is used to make the nerve agent VX. The plant's ceiling fell in on Labor Day in 1968 and crushed many of the containers, but no steps were taken to remove them until August 1984.

Ms. Barrett also described how the Army discovered in a nearby storage shed chemicals so old and deteriorated that a special unit had to destroy them by setting off an emergency explosion in a nearby

field. "It was, in fact, a disaster waiting to happen," she said of the discovery, which was made in 1985 after the investigation was started.

The prosecutor told the jury that when a tank containing sulfuric acid sprung a leak on Sept. 17, 1965, Mr. Gepp at first did nothing to stop it. "They stood around and watched it going down that storm drain" and eventually into nearby Carroll Creek, she said, killing hundreds of fish.

Ms. Barrett also told the jury that chemicals were dumped into the dumps or directly onto the ground outside the plant.

After the spill, an environmental engineer at the proving ground claimed that the plant was a "Pandora's box" of potential environmental problems. Ms. Barrett said that the engineer was persuaded that the problems were being corrected, but that another employee, whom she did not identify, eventually blew the whistle on the plant.

**66 What we have here is a witch hunt. We feel very strongly that we have been singled out. 99**

DEFENSE ATTORNEY

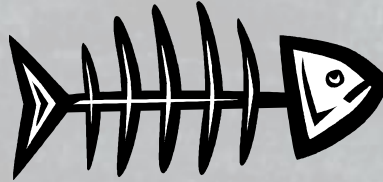
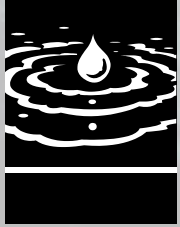
BALTIMORE SUN

11 January 1989

WASHINGTON POST

11 January 1989

Sulfuric Acid leak → Fish kill → Response by APG  
Clean Up Personnel



Baltimore Sun  
coverage



Disgruntled  
employee

“a virtual ‘Pandora’s Box’  
of potential sources of  
contamination...”

FBI

Investigation → Indictment → Trial → Conviction



February 23, 1989



SUBJECT: Ena

100

Trial	Control	MCI	AD
1	95	85	75
2	95	85	75
3	95	80	70
4	95	78	68
5	95	75	65

By Karen E. Warkness

---

THE MORNING SUN

24 February 1986

**By Elaine Arnscott**

Prosecutor Jane Barrett said today that this marks the first time a federal employee has been

Spokesman John Yand Friday that the Army

24 February 1960



"The case marks the first time federal officials have been convicted of routinely violating federal environmental laws."

## Aberdeen convictions shock federal work force

### Managers, workers ponder liability

By Karen E. Warmkessel

While the criminal conviction of top civil servants for illegally disposing of hazardous chemicals has sent a "shock wave" through the federal work force, environmentalists,

heartened by the outcome of the case, predicted that last week's verdict would send a strong deterrent message to public employees around the country.

"I think the clear implication is that we're very serious about looking at government facilities . . . for potential criminal violations," said Paul R. Thomsen, an attorney with the U.S. Environmental Protection Agency.

But Bruce L. Moyer, chief lobbyist for the Federal Managers Association, said his group is "seriously concerned" about the implications of the precedent-setting verdict handed up Thursday by a federal jury in Baltimore against three civilian managers at the U.S. Army's Aberdeen Proving Ground.

Mr. Moyer, whose association represents about 20,000 federal employees in supervisory jobs, said the

verdict sent a "shock wave" through the federal work force. Indeed, news of the verdict spread quickly among environmentalists, lawyers and, especially, among federal employees and government agencies.

Mr. Moyer said, for example, that he sent out a bulletin explaining the decision to his 150 chapters around the country within hours of the con-

vicition of three top managers at the Army's Chemical Research, Development and Engineering Center.

And by Friday morning one of the prosecutors in the case said she had already received several calls from government lawyers representing agencies such as the National Aeronautics and Space Administration asking for copies of the indictment and details of the case.

Donald A. Carr, a Justice Department attorney, said the case is likely to have a "tremendous impact" on federal employees and at federal facilities in insuring compliance with federal hazardous waste law.

"Clearly, federal employees, like everybody else, must obey the environmental laws," said Mr. Carr, the acting assistant attorney general in charge of the Justice Department's Land and Natural Resources Division.

Breckinridge L. Wilcox, the U.S. attorney for Maryland, whose prosecutors won the case, said his office is currently investigating allegations of additional environmental violations at Aberdeen and at other federal facilities in Maryland. He said there are "several in the state that are viable candidates."

According to EPA, there are at least 40 federal facilities in the state, primarily military installations such as Fort Meade in Anne Arundel County, Fort Detrick in Frederick and the Patuxent Naval Air Station in Lexington Park.

Prosecutors have declined to identify their targets. But it is clear that they will not feel themselves limited to federal agencies or toxic chemical cases and could bring criminal charges in other environmental cases, such as those involving illegal destruction of wetlands.

Federal prosecutors have changed an increasing number of private corporations and individuals with environmental crimes, but until recently have shied away from federal facilities, which some observers consider to be among the worst violators.

Robert Perchval, an assistant professor at the University of Maryland Law School, said the violations — such as at Aberdeen — have become "so egregious" because the agencies have been lulled into thinking that nobody could take effective enforcement action against them.

EPA has been frustrated from filing civil suits to insure compliance because the Justice Department says that one federal agency cannot sue another. Even if the government won such suits, agencies have not allocated any resources to correct the violations, Mr. Perchval said.

Such was the case at Aberdeen Proving Ground, where the convicted managers blamed the Army for a lack of money and guidance. According to environmentalists, the Harford County installation is still rife with environmental problems.

"The proving ground is an environmental nightmare," Scott Burns, another University of Maryland law school professor, charged. He said the violations involving the aging chemical weapons research plant was "the tip of the tip of the iceberg."

Although he was clearly pleased with the verdict, Mr. Wilcox said the indictment alone was sufficient to send a message to the work force, particularly managers. "These guys have had their consciousness heightened, which is the major purpose of bringing the case," he said.

The convictions returned against Carl E. Cepp, Robert E. Lemke and William C. Dee were felony violations carrying maximum penalties of five years in prison and fines of up to \$250,000.

Helen Ryan, president of the federal workers union that represents non-professional workers in the chemical weapons program at Aberdeen, said the verdict has workers at the proving ground worried.

"Everybody's frightened that they can be held criminally liable for doing their job," she said.

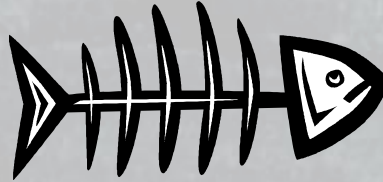
She said that on Friday — the day after the verdict — one worker refused to even handle chemicals. Under the rules, that is tantamount to insubordination, she said. "In the federal system, you must go ahead and do it first. Then, after you do it, you can grieve it," she said.

"The people are so upset and so distressed," Ms. Ryan said. "We're all in a state of shock."

Mr. Moyer, of the federal managers association, said his group plans to meet with congressional and administration leaders to see what, if anything, can be done to ensure that no other federal managers are made "scapegoats" for "environmental abuses that are long-standing, widespread and systemic in nature."

(Continued)

Sulfuric Acid leak → Fish kill → Response by APG  
Clean Up Personnel



Baltimore Sun  
coverage



Disgruntled  
employee

“a virtual ‘Pandora’s Box’  
of potential sources of  
contamination...”

FBI

Investigation → Indictment → Trial → Conviction

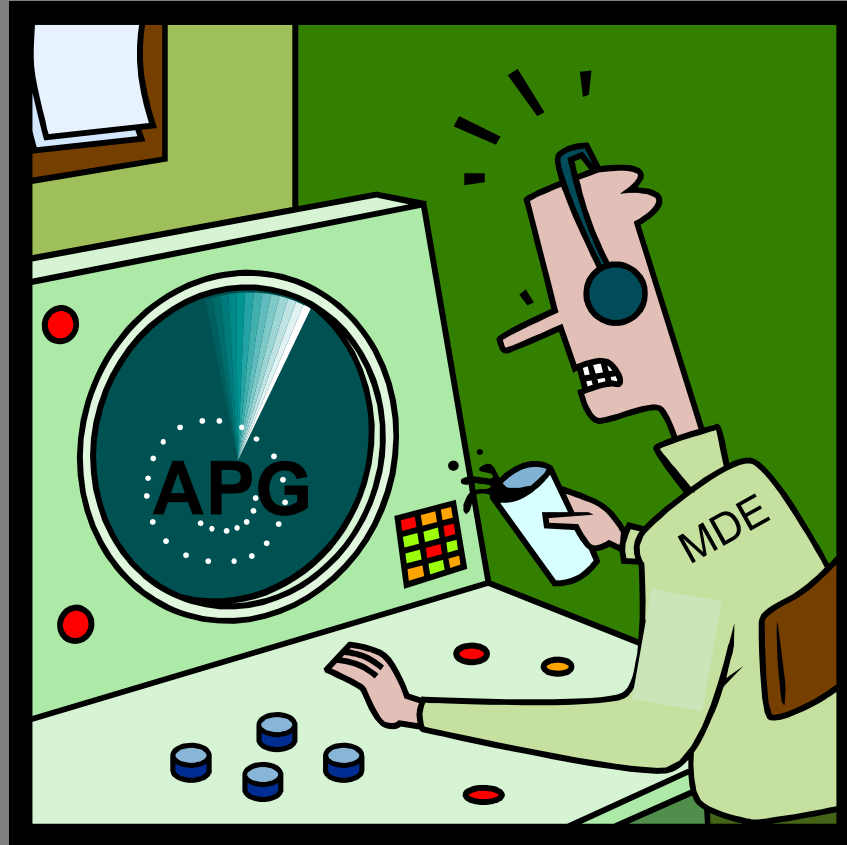


The background of the slide is a photograph of a winter scene. It shows a dense forest of evergreen trees heavily laden with snow. In the foreground, a wooden fence is partially visible, also covered in snow. The overall tone is cold and serene, with a soft, diffused light.

# Major Changes

- Focus on Environmental Compliance





1983

## Thermal Treatment Facility





DEPARTMENT OF THE ARMY  
U.S. ARMY ABERDEEN PROVING GROUND  
ABERDEEN PROVING GROUND, MARYLAND 21005

Form 10  
1-78

23 MAY 1986

STEAP-1C

SUBJECT: Appointment of Board of Officers

Colonel Aaron D. Duval  
Logistics Directorate  
U. S. Army Aberdeen Proving Ground  
Installation Support Activity  
Aberdeen Proving Ground, MD 21005-5001

1. A board of officers is hereby appointed pursuant to AR 15-6 to conduct a comprehensive analysis of hazard management on Aberdeen Proving Ground. The board's investigative charter is outlined in letter, U. S. Army Aberdeen Proving Ground, STEAP-1C, 7 May 1986, subject: Hazard Management on Aberdeen Proving Ground (see Enclosure). The board will, at a minimum, address the issues outlined in paragraphs 4 and 5 of that letter. However, it may, in addition, inquire into any area it deems relevant and material to its deliberations.

2. The following members are appointed to the board:

COL Aaron D. Duval, CM, USAAPGISA, Member (President)  
LTC Ferold Kowball, MC, USAMRIID, Member  
LTC Darwin B. Palmer, Jr., MS, USACRDC, Member  
LTC Robert Petzold, MC, KUSABM, Member  
CPT Martin S. Sander, MS, USAEHA, Member  
Robert P. Yockey, CM-15, USACSTA, Member  
Robert J. York, CM-14, USAEHA, Member  
Michael B. Dezsary, CM-13, USACRDEC, Member  
James L. Kennedy, GS-13, USAEHA, Member  
Sterling Percell, CM-13, USAAPGISA, Member  
Frances Lee Weaver Holden, CM-13, USAEEL, Member  
William N. Basseikus, CM-15, HQ, AMC, Advisory Member (without vote)  
Robert L. King, GS-13, HQ, AMC, Advisory Member (without vote)  
LTC Lawrence M. Ward, JAGG, USATECOM, Recorder/Legal Advisor (without vote)

3. The board will meet at the call of the President. It will utilize the procedures set forth in AR 15-6 applicable to formal boards.

4. The report of proceedings will be summarized and submitted to this headquarters. The board will furnish interim reports every 30 days which will outline the progress of the board and identify those areas which require the immediate attention of the appointing authority. At all times during its

23 May 1986

"A board of officers is hereby appointed pursuant to AR 15-6 to conduct a comprehensive analysis of hazard management on Aberdeen Proving Ground"

15-6 Board issued five interim reports over the next year and a final report on 7 May 87.

The six reports identified 124 specific directed actions, with 257 sub-elements, that were tracked for years to completion.

State environmental officials inspected every facility at CRDEC



January 30, 1987 – The Maryland Solid and Hazardous Waste Management Administration issued an emergency regulation listing waste military chemical agents and residues from the treatment of agents as hazardous waste.

The following substances are acute hazardous waste (H) and are subject to the exclusion defined in Regulation .05C of this chapter:			
Military	K991	Waste ethyl dimethylamidocyanophosphate, also known by the common names GA and Tabun and the following alternate chemical names: Ethyl N,N-dimethylphosphoramidocyanidate Dimethylamidoethoxyphosphoryl cyanide	(H)
	K992	Waste isopropyl methanefluorophosphonate, also known by the common names GB and Sarin and the following alternate chemical names: Isopropyl methylphosphonofluoridate   Isopropyl ester of methylphosphonofluoridic acid	(H)
	K993	Waste 3,3-dimethyl-n-but-2-yl methylphosphonofluoridate, also known by the common names GD and Soman and the following alternate chemical names: Pinacolyl methylphosphonofluoridate 1,2,2-trimethylpropyl methylphosphonofluoridate Pinacoloxymethylphosphoryl fluoride	(H)
	K994	Waste O-ethyl S-(2-dissopropyl-aminoethyl) methylphosphonothioate also know by the common name VX	(H)
	K995	Waste chlorovinylarsine dichloride, also known by the common names L and Lewisite and the following alternative chemical names: Dichloro (2-chlorovinyl) arsine 2-chlorovinylchlorarsine	(H)
	K996	Waste phenarsazine chloride, also known by the common names DM and Adamsite	(H)
	K997	Waste bis(2-chloroethyl) sulfide, also known by the common names sulfur mustard, H, HS, and HD, which is distilled sulfur mustard	(H)
	K998	Waste 2-2'-di(3-chloroethylthio)-diethyl ether, also know by the common name T and the following alternate chemical name: Bis-(2-chloroethylthioethyl) ether	(H)
	K999	Waste, lethal, military warfare agents having any substances identified in the listings for hazardous waste numbers K991 through K998 as their active or principal ingredient or ingredients, such as HT, which is a mixture of sulfur mustard and bis-(2-chloroethylthioethyl) ether	(H)

August 1988

IN THE MATTER OF: \*  
ABERDEEN PROVING GROUND \*  
\*  
\* MARYLAND DEPARTMENT OF  
\* THE ENVIRONMENT  
\*  
\* HAZARDOUS AND SOLID WASTE  
\* MANAGEMENT ADMINISTRATION  
\*  
\* 201 W. Preston Street  
\* Second Floor  
\* Baltimore, Maryland 21201  
\*  
\* CO-88-101

CONSENT ORDER

WHEREAS, the State of Maryland, Department of the Environment, pursuant to the powers and duties vested in the Secretary of the Department of the Environment by the Environment Article, Sections 1-301 and 7-201 through 7-268, inclusive, Annotated Code of Maryland, and delegated to the Director, Hazardous and Solid Waste Management Administration ("Administration"), has authority to enforce Maryland laws and regulations regarding controlled hazardous substances; and

WHEREAS, the Aberdeen Proving Ground by entering into the Consent Order neither admits nor denies any allegations set forth herein, and does not intend to waive or be estopped from asserting any of its rights or defenses, and enters into the Consent Order in the interest of expeditiously resolving the matters covered to best serve the public interest; and

WHEREAS, the State of Maryland has received from the Environmental Protection Agency authorization to operate the Maryland Hazardous Waste Program in lieu of the Federal Program,

Ex 12

Department of the Environment from taking any enforcement action that would otherwise be appropriate with respect to any such additional controlled hazardous substances.

K. By signing this Consent Order, Aberdeen Proving Ground waives any rights to a hearing concerning the terms and requirements of this Consent Order.

ORDERED BY:

DATE: 8/11/88

Thomas Andrews  
Thomas Andrews  
Deputy Secretary  
Maryland Department of the  
Environment

Approved as to form and legal  
sufficiency this 13th day  
of August, 1988.

Michael C. Howell  
Michael C. Howell  
Acting Principal Counsel  
Maryland Department of the  
Environment

CONSENTED TO:

DATE: 34 Aug 88

George H. Akin  
George H. Akin  
Major General, U.S. Army  
Commander  
Aberdeen Proving Ground

"... the following is hereby ORDERED by the Director, Hazardous and Solid Waste Management Administration, and CONSENTED to by the Aberdeen Proving Ground:"

August 1988



DEPARTMENT OF THE ARMY  
U.S. ARMY CHEMICAL RESEARCH, DEVELOPMENT AND ENGINEERING CENTER  
DURHAM PROVING GROUND, MARYLAND 21010-5423



REPORT TO  
ATTENTION OF

SMCCR-00 (310-1c)

23 AUG 1988

SUBJECT: Policy No. 4-88, First Line Supervisor Compliance Inspections of Work and Storage Areas

SEE DISTRIBUTION:

1. POLICY.

a. As one part of our offensive to achieve compliance with all applicable Federal, State, and local laws, regulations and directives related to safety, security, surety, environment, and management/disposal of hazardous waste, first line supervisors will, until further notice, personally perform biweekly inspections of all areas under their control. Findings which are beyond the capability of a directorate (or directorate level activity) to correct will be elevated, with recommended solutions, through channels to the Deputy Commander, CRDEC.

b. These biweekly inspections will focus on housekeeping, to include policing of grounds, proper storage of chemicals, management of hazardous chemical and radioactive waste.

c. Constructive discussions with employees concerning compliance issues and problems surfaced during inspections is encouraged.

d. A directorate level consolidated written certification of the biweekly inspection will be forwarded to the Deputy Commander, CRDEC. This will be executed at mid-month and at the end of the month, until further notice.

2. PROPONENT. Deputy Commander, CRDEC.

3. DISCUSSION. Assistance (checklists, as well as technical advice) is available from the Safety and Chemical Surety Offices, Office of the Provost Marshal, and the Environmental Quality Office. Training on conducting inspections will be provided to first line supervisors. Schedule for classes will be published at least annually. The Environmental Quality Office has lead on this action.

*Peter G. Piccolo*  
PETER G. PICCOLLO  
Brigadier General, USA  
Commanding

DISTRIBUTION:  
All CRDEC/AMCCOM Elements

“As one part of our offensive to achieve compliance with all applicable Federal, State, and local laws, regulations, and directives relating to safety, security, surety, environment, and management/disposal of hazardous waste, first line supervisors will, until further notice, personally perform biweekly inspections of all areas under their control.”





DEPARTMENT OF THE ARMY  
U.S. ARMY CHEMICAL RESEARCH, DEVELOPMENT AND ENGINEERING CENTER  
ABERDEEN PROVING GROUND, MARYLAND 21010-5422

REPLY TO  
ATTENTION OF

SMCCR-CO (200-12)

24 DEC 1988

MEMORANDUM FOR: Major General George H. Akin, Commander, U.S. Army  
Aberdeen Proving Ground, Aberdeen Proving Ground, Maryland 21005-5001

SUBJECT: Commander's Environmental Certification of Compliance


1. In accordance with AFCE 200-1, the environmental certification for U.S. Army Chemical Research, Development and Engineering Center (CRDEC) is enclosed. This statement reflects current compliance status to the best of my knowledge.

2. As I am sure you are aware, we are working diligently to fully meet all environmental standards. Much of our effort during the past 6 months has been related to requirements imposed by the Consent Order and Consent Judgment. We have developed a very close working relationship with the environmental staff of USAFPCSA. Together we are meeting the challenges imposed by the Judgment and the Order. We have also continued our proactive approach to improve our overall environmental program. Hazardous waste minimization (HWMIN) is considered during the planning of our research and development activities. All personnel involved in hazardous waste handling now receive regular training. Environmental compliance is of highest priority at CRDEC.

3. I am satisfied with our current environmental program, but I do not plan to stop here. I expect to see the program and overall environmental compliance continue to improve in the future.

4. The point of contact is Ms. Janis E. Chase, OIC, Environmental Quality Office, SMCCR-EM, 671-4912.

Encl

  
KEITH D. HINKLE  
Brigadier General, USA  
Commanding

CV:  
Cdr, USAFPCSA (w/encl)

December 1988

"This statement reflects current compliance status to the best of my knowledge."

# Major Changes

- Focus on Environmental Compliance
- Environmental Program

# Environmental Quality Office Mission



The ECBC Environmental Quality Office (EQO) consists of a multi-disciplined team of scientists and engineers who provide a full range of environmental services in the areas of compliance, conservation and pollution prevention. The office has expertise in environmental issues related to Chemical Biological Defense research, development, testing and acquisition.

Technical expertise in compliance matters minimizes environmental risks for projects, whether in the lab or on the range. We employ pollution prevention strategies to lower lifecycle costs and impacts to the environment.



We continually strive to understand our customer's needs while keeping abreast of current and future environmental issues and new legislation/regulations which may impact the Center, our customers and their programs.





DEPARTMENT OF THE ARMY  
US ARMY ABERDEEN PROVING GROUND  
ABERDEEN PROVING GROUND MARYLAND 21005-5001

REPLY TO  
ATTENTION OF

IMNE-APG-DIC

24 JAN 2011

MEMORANDUM FOR SEE DISTRIBUTION

SUBJECT: Aberdeen Proving Ground Environmental Policy

1. References:

- a. Executive Order 13423, Strengthening Federal Environmental, Energy, and Transportation Management, 26 Jan 07.
- b. Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance, 8 Oct 09.
- c. Executive Order 13508, Chesapeake Bay Protection and Restoration, 12 May 09.
- d. Memorandum, DASA (ESOH) OASA (I&E), 13 Jul 01, SUBJECT: Army Environmental Management Systems – ACTION MEMORANDUM.
- e. AR 200-1, Environmental Protection and Enhancement, 21 Feb 97.

2. Aberdeen Proving Ground (APG) is a major research, development, testing, and training installation located in the environmentally sensitive Chesapeake Bay watershed. Environmental issues are closely associated with many of the major challenges APG faces, and could impact our long-term sustainability and installation readiness. We have instituted an extensive environmental program that supports pollution prevention, environmental compliance, and restoration activities.

3. The fulfillment of our national defense mission depends on our individual and organizational commitment to conserving resources and protecting the environment in which we live and work. As such, the responsibility of environmental management has expanded from the environmental staff to every leader, Soldier, family, and civilian employee.

4. At APG our goal is to:

- a. continue our history of environmental stewardship;
- b. track and review specific environmental goals, and establish specific measures of performance to assist in assessing system effectiveness;
- c. ensure compliance with all applicable environmental policies, laws, and regulations;
- d. integrate Chesapeake Bay restoration goals into efforts to continually improve our environmental performance, and contribute to the restoration and protection of the Chesapeake Bay;
- e. set meaningful pollution prevention goals to reduce the environmental impacts associated with our mission;
- f. strengthen the range and scope of the National Environmental Policy Act (NEPA) as an integral part of our planning and business practices;
- g. actively pursue continual improvement in organizational environmental management systems;
- h. promote effective and timely training for every leader, Soldier, family, and civilian employee with the goal of understanding their relationship with the environment.

FOR THE COMMANDER:

  
ORLANDO W. ORTIZ  
Colonel, MI  
Deputy Installation Commander

“The fulfillment of our national defense mission depends on our individual and organizational commitment to conserving resources and protecting the environment in which we live and work.”

# Environmental Quality Control Committee (EQCC)

Air  
Subcommittee

Water/Wastewater  
Subcommittee

National Environmental  
Policy Act (NEPA)  
Subcommittee

Pollution  
Prevention (P2)  
Subcommittee

Solid & Hazardous  
Waste Subcommittee

Environmental  
Management System  
(EMS) Subcommittee

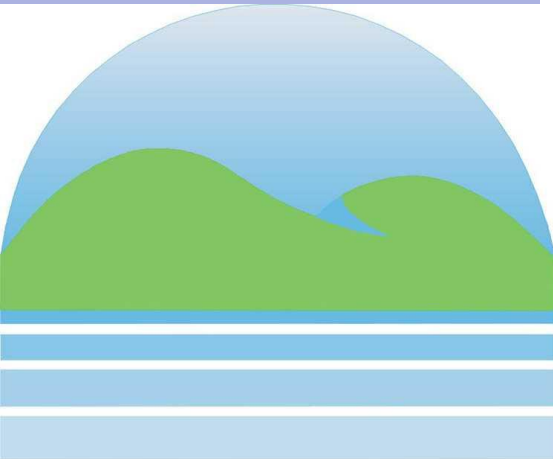
Natural Resources  
Subcommittee

# Major Changes

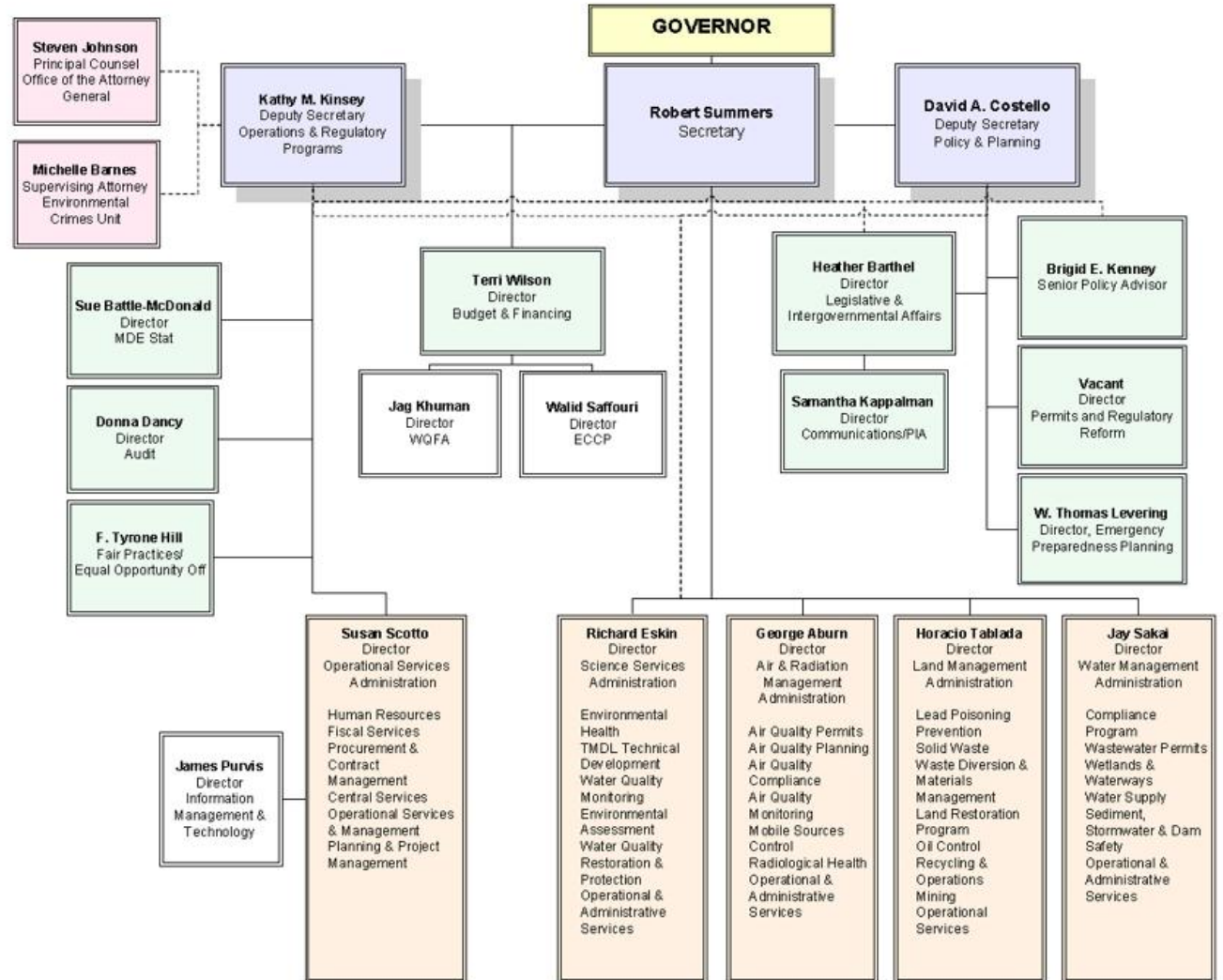
- Focus on Environmental Compliance
- Environmental Program
- Relationship with State and Public



Maryland Department of the Environment  
 1800 Washington Boulevard, Baltimore, MD 21230  
<http://www.mde.state.md.us>



# MDE





Much better relationship with public

# Major Changes

- Focus on Environmental Compliance
- Environmental Program
- Relationship with State and Public
- Compliance status



Inspection			Date of Inspection	Regulation Requiring Inspection	Summary of Inspection Results
<b>HAZARDOUS WASTE - Temporary Storage Sites (TSS) and Permitted Facilities</b>	<b>EPA / MDE</b>	Annual	30-Aug-10	40 CFR 261 et seq	no adverse findings; positive comments made
	<b>Garrison Quarterly</b>	1st quarter	19-Dec-10	COMAR 26.13, APGR 200-60	Minor findings noted at four facilities. All corrected.
		2nd quarter	3-Mar-10	COMAR 26.23, APGR 200-60	no deficiencies noted
		3rd quarter	24-May-10	COMAR 26.23, APGR 200-60	no deficiencies noted
		4th quarter	23-24 Aug 10	COMAR 26.23, APGR 200-60	no deficiencies noted
<b>Title V Air inspection</b>	<b>MDE</b>	Annual	2-Apr-10	Title V permit	no deficiencies noted
	<b>Garrison Quarterly</b>	1st quarter	1-Dec-09	Title V permit	no findings or deficiencies
		2nd quarter	15-Mar-10	Title V permit	no findings or deficiencies
		3rd quarter	9-Jun-10	Title V permit	no findings or deficiencies
		4th quarter		Title V permit	
<b>Hazardous inventory tracking system (HITS) validation</b>	<b>Garrison</b>	Annual	8-18 Mar 10	none	Passed w/ 95.8%

A small white bird is perched on the side of a hanging bird feeder. The feeder is a light-colored, teardrop-shaped container with a flat top, suspended by a string. The background is a soft-focus view of green foliage. The text "Remember the Lessons of History" is overlaid in the center in a large, bold, black font.

**Remember the  
Lessons of History**



*THE END*

